

# **EXHIBIT 4**

Volume 1  
Carlos Lopez Alaniz, Jr.

Kirkman vs.  
State of California

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
3  
4 SANDRA KIRKMAN AND CARLOS ) Case No.  
5 ALANIZ, INDIVIDUALLY AND AS ) 2:23-cv-07532-DMG-SSC  
6 SUCCESSORS-IN-INTEREST TO )  
7 JOHN ALANIZ, DECEASED, )  
8 )  
9 Plaintiffs, )  
10 )  
11 v. )  
12 )  
13 STATE OF CALIFORNIA; RAMON )  
14 SILVA; AND DOES 1-10, )  
15 INCLUSIVE, )  
16 )  
17 Defendants. )  
18 )  
19 )  
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14 REMOTE DEPOSITION OF CARLOS LOPEZ ALANIZ, JR.

15 VOLUME 1

16 La Habra, California

17 Wednesday, June 19, 2024

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22 Reported by:  
23 DENISE MARLOW  
24 RPR, CSR No. 11631

25 Job No. 10143232

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1 Q. Okay. So I want to ask you just a few  
2 background questions about John. And, again, this isn't  
3 meant to upset you or anything of that nature. Again,  
4 I'm just trying to obtain facts.

5 To your knowledge, had John ever been arrested?

6 A. No.

7 Q. To your knowledge, did he ever serve any time in  
8 jail or prison?

9 A. No.

10 Q. And to your knowledge, did John ever use any  
11 drugs or controlled substances?

12 A. No.

13 Q. And to your knowledge, did John ever undergo  
14 treatment at any drug treatment facilities?

15 A. No.

16 Q. To your knowledge, did John ever undergo  
17 treatment at any alcohol treatment facilities?

18 A. No.

19 Q. To your knowledge, did John ever suffer from any  
20 sort of psychological problems?

21 A. Yes.

22 Q. And can you describe what psychological problems  
23 he suffered from, that you're aware of?

24 A. Well, he was diagnosed at the VA hospital, PTSD  
25 and bipolar.

**Volume 1**  
**Carlos Lopez Alaniz, Jr.****Kirkman vs.**  
**State of California**

## REPORTER'S CERTIFICATION

I, Denise Marlow, Certified Shorthand Reporter  
in and for the State of California, do hereby certify:

That the witness named in the foregoing  
deposition was, before the commencement of the  
deposition, duly administered an oath in accordance  
with the Code of Civil Procedure Section 2094; that  
the testimony and proceedings were reported  
stenographically by me and later transcribed through  
computer-aided transcription under my direction and  
supervision; that the foregoing is a true record of the  
testimony and proceedings taken at that time.

IN WITNESS WHEREOF, I have hereunto subscribed  
my name this 3rd day of July, 2024.



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Denise Marlow, CSR No. 11631